

FILED
U.S. DISTRICT COURT
SAVANNAH DIV.IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION

2010 AUG -5 PM 4:30

CLERK
SO. DIST. OF GA.

UNITED STATES OF AMERICA)

v.)

JOHN WESLEY OBLEY, aka)
"ROG")

and)

JAMES BELL KENNIMORE, aka)
"BLACK")

and)

AARON J. MCCLENDON)

and)

TERMAINE TYRONE BUTLER)

INDICTMENT NO.

CR210 - 48

VIO: 18 U.S.C. § 924(c)

CARRY FIREARM DURING/
IN RELATION TO DRUG
TRAFFICKING;

21 U.S.C. § 846

CONSPIRACY TO
DISTRIBUTE CONTROLLED
SUBSTANCES;

21 U.S.C. § 841(a)(1), 860

DISTRIBUTION OF

CONTROLLED

SUBSTANCES;

18 U.S.C. § 473

DEALING IN COUNTERFEIT

OBLIGATIONS;

26 U.S.C. § 5861(d), (e)

POSSESSION AND

TRANSFER OF

UNREGISTERED

SAWED-OFF SHOTGUNS;

26 U.S.C. 5861(i)

POSSESSION OF

SAWED-OFF SHOTGUN

NOT IDENTIFIED BY

SERIAL NUMBER;

18 U.S.C. § 371

CONSPIRACY TO DEAL IN

FIREARMS WITHOUT

LICENSE;

18 U.S.C. § 922(a)(1)

UNLICENSED DEALING

IN FIREARMS

18 U.S.C. § 922(k)

POSSESSION OF FIREARM

WITH OBLITERATED

SERIAL NUMBER

) **21 U.S.C. § 853**
) **FORFEITURE**
)

THE GRAND JURY CHARGES:

COUNT ONE
(CONSPIRACY TO DEAL IN FIREARMS WITHOUT LICENSE)

A. The Conspiracy

1. Beginning at least on or about December 22, 2009, and continuing thereafter until at least on or about June 22, 2010, the exact dates being unknown to the Grand Jury, in Glynn County, within the Southern District of Georgia, and elsewhere, the Defendants herein,

JOHN WESLEY OBLEY, aka "ROG,"

JAMES BELL KENNIMORE, aka "BLACK,"

AARON J. MCCLENDON, and

TERMAINE TYRONE BUTLER,

aided and abetted by each other and other unindicted co-conspirators known and unknown to the Grand Jury, knowingly combined, conspired, confederated and agreed together and with each other, with some joining the conspiracy earlier and others later, to, while not being licensed importers, manufacturers, dealers or collectors, engage in the business of dealing in firearms, or in the course of such business to ship, transport or receive firearms in interstate commerce, in violation of Title 18, United States Code, Section 922(a)(1);

2. Each of the defendants knew and had reason to believe that the primary purpose of the conspiracy was to make money by engaging in the business of dealing in firearms by acquiring firearms and reselling them at a profit.

3. On the dates mentioned above, none of the defendants, **JOHN WESLEY OBLEY**, aka "**ROG**," **JAMES BELL KENNIMORE**, aka "**BLACK**," **AARON J. MCCLENDON**, nor **TERMAINE TYRONE BUTLER** was a federally licensed firearms dealer.

B. Overt Acts

4. In furtherance of the conspiracy and to effect the objects thereof, the defendants and their unindicted co-conspirators committed the below listed transactions on the dates noted:

DATES SOLD	FIREARMS SOLD	SELLERS
12/22/2009 3:50 p.m.	RG, Model 23, .22 caliber revolver, Serial Number T505637	MCCLENDON
1/12/2010	Smith & Wesson, Model 15-3, .38 caliber revolver, Serial Number 8K13782	MCCLENDON and KENNIMORE
1/19/2010	Grendel Inc., Model P-12, .380 caliber semiautomatic pistol, Serial Number 30432	KENNIMORE
1/27/2010 7:04 p.m.	Colt, .32 caliber revolver, no visible serial number	KENNIMORE
2/2/2010	Hi Point, Model C9, 9mm semiautomatic pistol, Serial Number P229207	KENNIMORE
2/4/2010	Cobra, Model CA-92, .32 caliber semiautomatic pistol, Serial Number CP02564	KENNIMORE
2/9/2010	"Nitro Hunter," 12 gauge shotgun, serial number obliterated	KENNIMORE
2/10/2010	Masterpiece Arms, 9mm rifle, Serial Number B5474	KENNIMORE
2/16/2010 12:33 p.m.	Hi Point, Model JHP, .45 caliber semiautomatic pistol, Serial Number X474560	KENNIMORE
3/2/2010	1. RG Industries, Model RG, .22 caliber revolver, Serial Number 28519 2. Charter Arms, Model Undercover, 5 shot .38 caliber revolver, Serial Number 615591	KENNIMORE
3/3/2010	Hi Point, Model JCP, .40 caliber semiautomatic pistol, Serial Number X7102911	KENNIMORE
3/3/2010	Charter Arms, Model AR 7, .22 caliber rifle, Serial Number A265599	OBLEY
3/4/2010 1:51 p.m.	Hi Point, Model JHP, .45 caliber semiautomatic pistol, Serial Number X4133024	OBLEY
3/4/2010 4:07 p.m.	Hi Point, Model JCP, .40 caliber semiautomatic pistol, Serial Number X7102932	OBLEY and KENNIMORE

3/16/2010	Interdynamic, Model KG-99, 9mm semiautomatic pistol, Serial Number 07435	KENNIMORE
3/17/2010 2:24 p.m.	Bersa, Model Thunder 380, .380 caliber semiautomatic pistol, Serial Number 819890	KENNIMORE
3/17/2010 5:20 p.m.	Mossberg, Model (obliterated), 12 gauge pump action shotgun, serial number obliterated	OBLEY
3/23/2010	Makarov, Model M9X18, 9X18mm semiautomatic pistol, Serial Number AX3400	OBLEY
4/7/2010	Hi Point, Model CF380, .380 caliber semiautomatic pistol, Serial Number P725800	OBLEY
4/8/2010	Colt, model Huntsman, .22 caliber pistol, with serial number 142412	OBLEY
4/28/2010	Volunteer Enterprises, Model Commando Mark 45, .45 caliber rifle, Serial Number 52241	OBLEY
5/6/2010	Clerke, Model Clerke 1 st , .32 caliber revolver, Serial Number 456330	OBLEY
5/13/2010 2:34 p.m.	RG, Model 14, .22 caliber revolver, Serial Number 398566	MCCLENDON
5/13/2010 5:54 p.m.	Bryco Arms, Model Jennings J-22, .22 caliber semiautomatic pistol, Serial Number 144270	BUTLER
5/18/2010 12:47 p.m.	Crown City Arms, .45 caliber semiautomatic pistol, Serial Number A01522	MCCLENDON and BUTLER
5/26/2010 12:29 p.m.	Bryco Arms, Model Bryco 38, .380 caliber semiautomatic pistol, Serial Number 1261647	MCCLENDON and BUTLER
5/26/2010 12:49 p.m.	Lorcin, Model L9mm, 9mm semiautomatic pistol, Serial Number 123260	MCCLENDON and BUTLER
6/1/2010	Hi Point, Model JCP, .40 caliber semiautomatic pistol, Serial Number X787393	MCCLENDON and BUTLER
6/8/2010	Irwindale Arms (IAI), Model Backup, .380 caliber semiautomatic pistol, Serial Number M12905	MCCLENDON and BUTLER
6/15/2010	Hi Point, Model CF380, .380 caliber semiautomatic pistol, Serial Number P868007	MCCLENDON and BUTLER
6/22/2010 12:52 p.m.	Hi Point, Model C9, 9mm semiautomatic pistol, Serial Number P1292057	MCCLENDON and BUTLER
6/22/2010 3:04 p.m.	Colt, Model 1911 U.S. Army 45 ACP, .45 caliber semiautomatic pistol, Serial Number 437111	MCCLENDON and BUTLER

5. On or about the dates mentioned above, defendants **JOHN WESLEY OBLEY, aka "ROG," JAMES BELL KENNIMORE, aka "BLACK," AARON J. MCCLENDON and TERMAINE TYRONE BUTLER** sold the firearms mentioned above to agents of the Bureau

of Alcohol, Tobacco, Firearms and Explosives working in an undercover capacity in Glynn County, Georgia.

In violation of Title 18, United States Code, Section 371.

COUNT TWO
(CONSPIRACY TO DISTRIBUTE CONTROLLED SUBSTANCES)

From on or about December 22, 2009 through June 22, 2010, the exact dates being unknown to the Grand Jury, in Glynn County, within the Southern District of Georgia, and elsewhere, defendants **JOHN WESLEY OBLEY, aka "ROG," JAMES BELL KENNIMORE, aka "BLACK," AARON J. MCCLENDON and TERMAINE TYRONE BUTLER,** aided and abetted by each other and by others known and unknown, did unlawfully, knowingly and intentionally combine, conspire, confederate and agree together, with each other, and with other persons, both known and unknown to the Grand Jury, with some joining the conspiracy earlier and others later, to commit offenses against the United States, to wit: to possess with intent to distribute and to distribute quantities of 3, 4-methylenedioxymethamphetamine, commonly known as "ecstasy," a Schedule I controlled substance, and cocaine hydrochloride, a Schedule II controlled substance, within 1000 feet of the real property comprising Heritage Christian Academy, a private elementary and secondary school, in violation of Title 21, United States Code, Sections 841 and 860; In violation of Title 21, United States Code, Section 846 and Title 18, United States Code, Section 2.

COUNT THREE
(UNLICENSED DEALING IN FIREARMS)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraph 4 of Count One is incorporated as if fully set forth herein.
2. Beginning at least on or about December 22, 2009, and continuing thereafter until at least on or about June 22, 2010, the exact dates being unknown to the Grand Jury, in Glynn County, within the Southern District of Georgia, the defendants, **JOHN WESLEY OBLEY, aka "ROG," JAMES BELL KENNIMORE, aka "BLACK," AARON J. MCCLENDON and TERMAINE TYRONE BUTLER**, aided and abetted by each other and by others known and unknown, willfully engaged in the business of dealing in firearms without a license;

In violation of Title 18, United States Code, Sections 922(a)(1)(A) and 924(a)(1)(D).

COUNT FOUR
(DISTRIBUTION OF CONTROLLED SUBSTANCES-MCCLENDON)

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 22, 2009, in Glynn County, within the Southern District of Georgia, the defendant, **AARON J. MCCLENDON**, did knowingly and intentionally distribute a quantity of cocaine hydrochloride, a Schedule II controlled substance, and did so within 1000 feet of the real property comprising Heritage Christian Academy, a private elementary and secondary school;

In violation of Title 21, United States Code, Sections 841(a)(1) and 860.

COUNT FIVE
(DISTRIBUTION OF CONTROLLED SUBSTANCES-MCCLENDON)

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 5, 2010, in Glynn County, within the Southern District of Georgia, the defendant, **AARON J. MCCLENDON**, did knowingly and intentionally distribute a quantity of cocaine hydrochloride, a Schedule II controlled substance, and did so within 1000 feet of the real property comprising Heritage Christian Academy, a private elementary and secondary school;

In violation of Title 21, United States Code, Sections 841(a)(1) and 860.

COUNT SIX
(POSSESSION OF FIREARM WITH OBLITERATED SERIAL NUMBER - MCCLENDON)

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 6, 2010, in Glynn County, within the Southern District of Georgia, the defendant, **AARON J. MCCLENDON**, did knowingly and unlawfully possess a firearm, which had previously been shipped and transported in interstate and foreign commerce, that is, a Hi Point, Model JCP, .40 caliber semiautomatic pistol, which had the importer's or manufacturer's serial number removed, obliterated, and altered on the butt of the firearm;

In violation of Title 18, United States Code, Section 922(k).

COUNT SEVEN
(POSSESSION OF UNREGISTERED FIREARM – KENNIMORE)

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 9, 2010, in Glynn County, within the Southern District of Georgia,

the defendant, **JAMES BELL KENNIMORE, aka "BLACK,"** knowingly possessed a firearm, that is, a "Nitro Hunter," 12 gauge shotgun, with obliterated serial number, with a barrel length shorter than 18 inches and an overall length less than 26 inches, not registered to either of them in the National Firearms Registration and Transfer Record;

In violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

COUNT EIGHT

**(POSSESSION OF FIREARM NOT IDENTIFIED BY SERIAL NUMBER –
KENNIMORE)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 9, 2010, in Glynn County, within the Southern District of Georgia, the defendant, **JAMES BELL KENNIMORE, aka "BLACK,"** knowingly possessed a firearm, that is, a "Nitro Hunter," 12 gauge shotgun, with obliterated serial number, with a barrel length shorter than 18 inches and an overall length less than 26 inches, not identified by a serial number as required by chapter 53 of Title 26;

In violation of Title 26, United States Code, Sections 5861(i) and 5871.

COUNT NINE

(TRANSFER OF SAWED-OFF SHOTGUN – KENNIMORE)

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 9, 2010, in Glynn County, within the Southern District of Georgia, the defendant, **JAMES BELL KENNIMORE, aka "BLACK,"** knowingly and unlawfully transferred a firearm, that is, a "Nitro Hunter," 12 gauge shotgun, with obliterated serial number,

with a barrel length shorter than 18 inches and an overall length less than 26 inches, to undercover agents of the Bureau of Alcohol, Tobacco, Firearms, and Explosives;

In violation of Title 26, United States Code, Sections 5812, 5861(e), and 5871.

COUNT TEN
(DISTRIBUTION OF CONTROLLED SUBSTANCES-KENNIMORE)

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 16, 2010, at approximately 1:58 p.m., in Glynn County, within the Southern District of Georgia, the defendant, **JAMES BELL KENNIMORE, aka "BLACK,"** did knowingly and intentionally distribute a quantity of cocaine hydrochloride, a Schedule II controlled substance, and did so within 1000 feet of the real property comprising Heritage Christian Academy, a private elementary and secondary school;

In violation of Title 21, United States Code, Sections 841(a)(1) and 860.

COUNT ELEVEN
(DISTRIBUTION OF CONTROLLED SUBSTANCES-KENNIMORE)

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 2, 2010, in Glynn County, within the Southern District of Georgia, the defendant, **JAMES BELL KENNIMORE, aka "BLACK,"** aided and abetted by another and by others known and unknown, did knowingly and intentionally distribute a quantity of cocaine hydrochloride, a Schedule II controlled substance, and did so within 1000 feet of the real property comprising Heritage Christian Academy, a private elementary and secondary school;

In violation of Title 21, United States Code, Sections 841(a)(1) and 860.

COUNT TWELVE
(CARRY FIREARM DURING/IN RELATION TO DRUG TRAFFICKING—
KENNIMORE)

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 2, 2010, in Glynn County, within the Southern District of Georgia, the defendant, **JAMES BELL KENNIMORE**, aka "**BLACK**," aided and abetted by another and by others known and unknown, knowingly and unlawfully, and during and in relation to the drug trafficking offense charged in Count Eleven, used and carried firearms, that is:

1. RG Industries, Model RG, .22 caliber revolver, Serial Number 28519
2. Charter Arms, Model Undercover, 5 shot .38 caliber revolver, Serial Number 615591;

In violation of Title 18, United States Code, Section 924(c).

COUNT THIRTEEN
(POSSESSION OF UNREGISTERED FIREARM – OBLEY)

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 17, 2010, at approximately 5:20 p.m., in Glynn County, within the Southern District of Georgia, the defendant, **JOHN WESLEY OBLEY**, aka "**ROG**," aided and abetted by another and by others known and unknown, knowingly possessed a firearm, that is, a Mossberg, Model (obliterated), 12 gauge shotgun, with obliterated serial number, with a barrel length shorter than 18 inches and an overall length less than 26 inches, not registered to either of them in the National Firearms Registration and Transfer Record;

In violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

COUNT FOURTEEN

(POSSESSION OF FIREARM NOT IDENTIFIED BY SERIAL NUMBER – OBLEY)

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 17, 2010, at approximately 5:20 p.m., in Glynn County, within the Southern District of Georgia, the defendant, **JOHN WESLEY OBLEY, aka “ROG,”** aided and abetted by another and by others known and unknown, knowingly possessed a firearm, that is, a Mossberg, Model (obliterated), 12 gauge shotgun, with a barrel length shorter than 18 inches and an overall length less than 26 inches, not identified by a serial number as required by chapter 53 of Title 26;

In violation of Title 26, United States Code, Sections 5861(i) and 5871.

COUNT FIFTEEN

(TRANSFER OF SAWED-OFF SHOTGUN – OBLEY)

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 17, 2010, at approximately 5:20 p.m., in Glynn County, within the Southern District of Georgia, the defendant, **JOHN WESLEY OBLEY, aka “ROG,”** aided and abetted by another and by others known and unknown, knowingly and unlawfully transferred a firearm, that is, a Mossberg, Model (obliterated), 12 gauge shotgun, with obliterated serial number, with a barrel length shorter than 18 inches and an overall length less than 26 inches, to undercover agents of the Bureau of Alcohol, Tobacco, Firearms, and Explosives;

In violation of Title 26, United States Code, Sections 5812, 5861(e), and 5871.

COUNT SIXTEEN
(DISTRIBUTION OF CONTROLLED SUBSTANCES-OBLEY)

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 23, 2010, in Glynn County, within the Southern District of Georgia, the defendant, **JOHN WESLEY OBLEY, aka "ROG,"** aided and abetted by another and by others known and unknown, did knowingly and intentionally distribute a quantity of cocaine hydrochloride, a Schedule II controlled substance, and did so within 1000 feet of the real property comprising Heritage Christian Academy, a private elementary and secondary school; In violation of Title 21, United States Code, Sections 841(a)(1) and 860.

COUNT SEVENTEEN
(CARRY FIREARM DURING/IN RELATION TO DRUG TRAFFICKING—OBLEY)

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 23, 2010, in Glynn County, within the Southern District of Georgia, the defendant, **JOHN WESLEY OBLEY, aka "ROG,"** aided and abetted by another and by others known and unknown, knowingly and unlawfully, and during and in relation to the drug trafficking offense charged in Count Sixteen, used and carried a firearm, that is, a Makarov, Model M9X18, 9X18mm semiautomatic pistol, Serial Number AX3400; In violation of Title 18, United States Code, Section 924(c).

COUNT EIGHTEEN
(DISTRIBUTION OF CONTROLLED SUBSTANCES-OBLEY)

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 22, 2010, in Glynn County, within the Southern District of Georgia, the defendant, **JOHN WESLEY OBLEY, aka "ROG,"** did knowingly and intentionally

distribute a quantity of 3, 4-methylenedioxymethamphetamine, commonly known as "ecstasy," a Schedule I controlled substance, and did so within 1000 feet of the real property comprising Heritage Christian Academy, a private elementary and secondary school;
In violation of Title 21, United States Code, Sections 841(a)(1) and 860.

COUNT NINETEEN
(DISTRIBUTION OF CONTROLLED SUBSTANCES-OBLEY)

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 27, 2010, in Glynn County, within the Southern District of Georgia, the defendant, **JOHN WESLEY OBLEY, aka "ROG,"** did knowingly and intentionally distribute a quantity of cocaine hydrochloride, a Schedule II controlled substance, and did so within 1000 feet of the real property comprising Heritage Christian Academy, a private elementary and secondary school;
In violation of Title 21, United States Code, Sections 841(a)(1) and 860.

COUNT TWENTY
(DISTRIBUTION OF CONTROLLED SUBSTANCES-OBLEY)

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 6, 2010, in Glynn County, within the Southern District of Georgia, the defendant, **JOHN WESLEY OBLEY, aka "ROG,"** aided and abetted by another and by others known and unknown, did knowingly and intentionally distribute quantities of 3, 4-methylenedioxymethamphetamine, commonly known as "ecstasy," a Schedule I controlled substance, and cocaine hydrochloride, a Schedule II controlled substance, and did so within 1000 feet of the real property comprising Heritage Christian Academy, a private elementary and

secondary school;

In violation of Title 21, United States Code, Sections 841(a)(1) and 860.

COUNT TWENTY-ONE
(CARRY FIREARM DURING/IN RELATION TO DRUG TRAFFICKING--OBLEY)

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 6, 2010, in Glynn County, within the Southern District of Georgia, the defendant, **JOHN WESLEY OBLEY, aka "ROG,"** aided and abetted by another and by others known and unknown, knowingly and unlawfully, and during and in relation to the drug trafficking offense charged in Count Twenty, used and carried a firearm, that is, a Clerke, Model Clerke 1st, .32 revolver, Serial Number 456330;

In violation of Title 18, United States Code, Section 924(c).

COUNT TWENTY-TWO
(DISTRIBUTION OF CONTROLLED SUBSTANCES—MCCLENDON, BUTLER)

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 18, 2010, at approximately 2:45 p.m., in Glynn County, within the Southern District of Georgia, the defendants, **AARON J. MCCLENDON and TERMAINE TYRONE BUTLER,** aided and abetted by each other and by other persons both known and unknown, did knowingly and intentionally distribute a quantity of cocaine hydrochloride, a Schedule II controlled substance, and did so within 1000 feet of the real property comprising Heritage Christian Academy, a private elementary and secondary school;

In violation of Title 21, United States Code, Sections 841(a)(1) and 860.

COUNT TWENTY-THREE
(DISTRIBUTION OF CONTROLLED SUBSTANCES-OBLEY)

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 22, 2010, at approximately 3:05 p.m., in Glynn County, within the Southern District of Georgia, the defendant, **JOHN WESLEY OBLEY, aka "ROG,"** did knowingly and intentionally distribute a quantity of 3, 4-methylenedioxymethamphetamine, commonly known as "ecstasy," a Schedule I controlled substance, and did so within 1000 feet of the real property comprising Heritage Christian Academy, a private elementary and secondary school;

In violation of Title 21, United States Code, Sections 841(a)(1) and 860.

COUNT TWENTY-FOUR
(DEALING IN COUNTERFEIT OBLIGATIONS--OBLEY)

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 22, 2010, at approximately 3:05 p.m., in Glynn County, within the Southern District of Georgia, the defendant, **JOHN WESLEY OBLEY, aka "ROG,"** aided and abetted by another and by others known and unknown, did knowingly sell, transfer, and deliver to undercover agents of the Bureau of Alcohol, Tobacco, Firearms, and Explosives, false, forged, counterfeited, and altered obligations of the United States, that is:

1. three one-hundred-dollar Federal Reserve Notes, Series of 2003, Serial Number
FK07137330A,

2. 10 one-hundred-dollar Federal Reserve Notes, Series of 1996, Serial Number

AB54860163E;

with the intent that the same be passed, published and used as true and genuine, in violation of Title 18, United States Code, Section 473.

COUNT TWENTY-FIVE
(DEALING IN COUNTERFEIT OBLIGATIONS--OBLEY)

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 22, 2010, at approximately 4:57 p.m., in Glynn County, within the Southern District of Georgia, the defendant, **JOHN WESLEY OBLEY, aka "ROG,"** aided and abetted by another and by others known and unknown, did knowingly sell, transfer, and deliver to undercover agents of the Bureau of Alcohol, Tobacco, Firearms, and Explosives, false, forged, counterfeited, and altered obligations of the United States, that is, 20 fifty-dollar Federal Reserve Notes, Series of 2006, Serial Number IB59898341A, with the intent that the same be passed, published and used as true and genuine, in violation of Title 18, United States Code, Section 473.

COUNT TWENTY-SIX
(DEALING IN COUNTERFEIT OBLIGATIONS--OBLEY)

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 22, 2010, at approximately 5:49 p.m., in Glynn County, within the Southern District of Georgia, the defendant, **JOHN WESLEY OBLEY, aka "ROG,"** aided and abetted by another and by others known and unknown, did knowingly sell, transfer, and deliver to undercover agents of the Bureau of Alcohol, Tobacco, Firearms, and Explosives, false, forged, counterfeited, and altered obligations of the United States, that is, 40 fifty-dollar Federal Reserve Notes, Series of 2006, Serial Number IB59898341A, with the intent that the same be passed, published and used as true and genuine, in violation of Title 18, United States Code, Section 473.

COUNT TWENTY-SEVEN
(DEALING IN COUNTERFEIT OBLIGATIONS—OBLEY, MCCLENDON)

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 1, 2010, in Glynn County, within the Southern District of Georgia, the defendants, **JOHN WESLEY OBLEY, aka "ROG," and AARON J. MCCLENDON,** aided and abetted by one another and by others known and unknown, did knowingly sell, transfer, and deliver to undercover agents of the Bureau of Alcohol, Tobacco, Firearms, and Explosives, false, forged, counterfeited, and altered obligations of the United States, that is:

1. One one-hundred-dollar Federal Reserve Notes, Series of 2006, Serial Number HB10120703K,
2. 12 one-hundred-dollar Federal Reserve Notes, Series of 2003, Serial Number FK07137330A,
3. 17 one-hundred-dollar Federal Reserve Notes, Series of 1996, Serial Number AB54860163E;

with the intent that the same be passed, published and used as true and genuine, in violation of Title 18, United States Code, Section 473.

COUNT TWENTY-EIGHT
FORFEITURE ALLEGATION

1. The allegations contained in Counts 2, 4, 5, 10, 11, 16, 18-20, and 22-24 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 21 U.S.C. § 853.

2. Upon conviction of Counts 2, 4, 5, 10, 11, 16, 18-20, or 22-24 of this Indictment, the named Defendants shall forfeit to the United States of America, pursuant to 21 U.S.C. § 853, any property constituting, or derived from, any proceeds Defendants obtained, directly or indirectly, as the result of such violations as well as any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations, including, but not limited to:

2005 Ford Super Duty Pickup Truck, VIN: 1FTWW33P45EC59538

3. If any property subject to forfeiture, or described above, as a result of any act or omission of the Defendants:

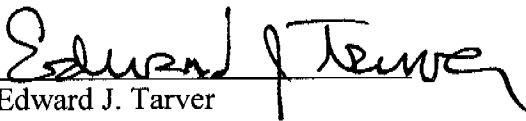
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

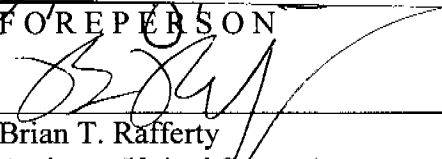
the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

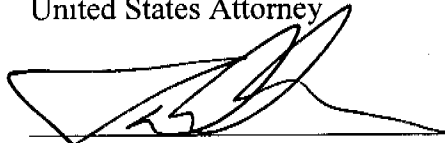
All pursuant to 21 U.S.C. § 853.


A TRUE BILL.


FOREPERSON


Edward J. Tarver
United States Attorney


Brian T. Rafferty
Assistant United States Attorney


James D. Durham
Assistant United States Attorney


Jeffrey J. Burstatte
Assistant United States Attorney


Cameron Heaps Ippolito**
Assistant United States Attorney

****Lead Counsel**